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E-FILED 8/19/08

Attorneys for Defendants COUNTY OF MONTEREY and
MICHAEL KANALAKIS

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JIMMY D. HAWS, SETH DANIEL HAWS,
and MIA SKYE HAWS, minors, by and
through their guardian ad litem, CARRIE A.
HAWS, and CARRIE A. HAWS,
individually.

Case No. C 07-02599 JF

STIPULATION FOR PROTECTIVE ORDER

[Northern District Local Rule 47-4]

Plaintiffs,

COUNTY OF MONTEREY, MICHAEL
KANALAKIS, NATIVIDAD MEDICAL
CENTER and DOES 1-300, inclusive.

Defendants.

The parties hereby stipulate that, due to security concerns, any documents produced by Defendants through discovery which consist of architectural drawings, schematics, blue prints, drawings or any document that depicts the physical layout of the Monterey County Jail is hereby subject to a Protective Order that prohibits disclosure of said documents to Plaintiffs or any third parties. Said documents are only to be disclosed to both plaintiffs' counsel and their staffs or any individuals necessary for the preparation of this matter for trial and to any experts retained in the scope of the litigation and/or trial of the above-captioned matter.

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1 IT IS SO STIPULATED:

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4 DATED: August 12, 2008

CHARLES J. McKEE, County Counsel

5

6

By 
TRACI A. KIRKBRIDE, Deputy County Counsel

7

8 Attorneys for Defendants COUNTY OF MONTEREY
9 and MICHAEL KANALAKIS

10 DATED: August ____, 2008

11 MICHAEL B. MOORE

12

13

Attorney for Plaintiffs JIMMY D. HAWS, SETH
DANIEL HAWS, and MIA SKYE HAWS, minors, by
and through their *guardian ad litem*, CARRIE A. HAWS,
and CARRIE A. HAWS, individually

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15

DATED: August ____, 2008

RALPH W. BOROFF

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Attorney for Plaintiffs JIMMY D. HAWS, SETH
DANIEL HAWS, and MIA SKYE HAWS, minors, by
and through their *guardian ad litem*, CARRIE A. HAWS,
and CARRIE A. HAWS, individually

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20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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DATED: August ____, 2008

23 RICHARD SEEBORG
United States Magistrate Judge

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4 DATED: August 12, 2008

CHARLES J. McKEE, County Counsel

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9 and MICHAEL KANALAKIS

10 DATED: August 12, 2008

11 MICHAEL B. MOORE

12 Attorney for Plaintiffs JIMMY D. HAWS, SETH
13 DANIEL HAWS, and MIA SKYE HAWS, minors, by
14 and through their *guardian ad litem*, CARRIE A. HAWS,
15 and CARRIE A. HAWS, individually

16 DATED: August _____, 2008

17 RALPH W. BOROFF

18 Attorney for Plaintiffs JIMMY D. HAWS, SETH
19 DANIEL HAWS, and MIA SKYE HAWS, minors, by
20 and through their *guardian ad litem*, CARRIE A. HAWS,
21 and CARRIE A. HAWS, individually

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23 DATED: August _____, 2008

24 RICHARD SEEBORG
25 United States Magistrate Judge

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4 DATED: August 12, 2008

CHARLES J. McKEE, County Counsel

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By

TRACI A. KIRKBRIDE, Deputy County Counsel

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Attorneys for Defendants COUNTY OF MONTEREY
and MICHAEL KANALAKIS

9

10 DATED: August , 2008

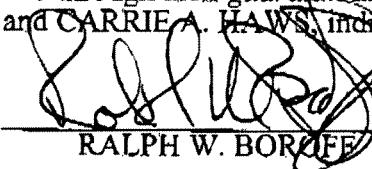
MICHAEL B. MOORE

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DATED: August 12, 2008

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and CARRIE A. HAWS, individually

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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DATED: August 19, 2008



RICHARD SEEBORG
United States Magistrate Judge

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